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12 *Attorneys for Defendant Carriage
 Cemetery Services, Inc.*

13 **UNITED STATES DISTRICT COURT**

14 **FOR THE STATE OF NEVADA**

15 RHONDA COLLINS, an individual,

16 Plaintiff,

17 vs.

18 CARRIAGE CEMETERY SERVICES, INC.,
 19 doing business as BUNKER'S MEMORY
 20 GARDENS MEMORIAL PARK, DOES 1
 21 through 100; and ROE CORPORATION 101
 22 through 200, inclusive,

23 Defendants.

24 **Case No. 2:22-cv-00814-JAD-NJK**

25 **JOINT STIPULATION AND ORDER TO
 26 EXTEND CASE MANAGEMENT
 27 DEADLINES**

28 **(FIRST REQUEST)**

29 Pursuant to FRCP 26 and 29 and LR 26-3 and LR IA 6-1, 6-2, Plaintiff Rhonda Collins
 30 (“Plaintiff”) and Defendant Carriage Cemetery Services, Inc. (“Defendant”) (collectively, “the
 31 Parties”), through their respective undersigned counsel, hereby request that the discovery deadlines
 32 in the Court’s Order dated July 15, 2022 [ECF No. 13], be extended by ninety (90) days. This is
 33 the first request for an extension of case management deadlines.

34 **I. DISCOVERY COMPLETED TO DATE**

35 1. Plaintiff served her Initial 16.1 Disclosures.
 36 2. Plaintiff served her First Supplement to Initial 16.1 Disclosures.
 37 3. Defendant served its Initial 16.1 Disclosures.

1 4. Plaintiff served her First Set of Interrogatories, Requests for Admissions, and
 2 Requests for Production.

3 5. Defendant served its Responses to Plaintiff's First Set of Interrogatories, Requests
 4 for Admissions, and Requests for Production.

5 6. Defendant served its First Set of Interrogatories and Requests for Production.

6 7. Plaintiff served her Responses to Defendant's First Set of Interrogatories and
 7 Requests for Production.

8 8. Defendant served nine Subpoena Duces Tecum for Plaintiff's medical records.

9 **II. DISCOVERY TO BE COMPLETED AND REASONS WHY THE DISCOVERY**
 10 **WAS NOT YET COMPLETED**

11 On September 28, 2022, the Parties participated in an early mediation with Judge Gene
 12 Porter in good faith in an attempt to resolve this case in its early stages. However, the parties did
 13 not reach resolution at mediation. As currently scheduled, the initial expert deadline in this case is
 14 December 19, 2022. [ECF No. 13]. The Parties agree that more time is needed to complete fact
 15 discovery prior to the expert disclosure deadline, and therefore the Parties jointly and respectfully
 16 request an extension of the discovery deadlines to allow time for the following activities to be
 17 completed:

18 1. **Fact witness depositions:** Defendant wishes to depose fact witnesses, including,
 19 but not limited to, Plaintiff Rhonda Collins and her boyfriend and eyewitness, Chris Frehner, as
 20 well as any other fact witnesses that may come to light as the result of further discovery.
 21 Depositions of Plaintiff's treating physicians may also be necessary. Defendant is waiting on
 22 responses to subpoenas sent to treating physicians, and based on these documents, there may be
 23 additional subpoenas and depositions. Due to the time expended preparing for and attending
 24 mediation, these depositions (especially treating physicians) likely cannot be arranged and
 25 conducted in sufficient time before the initial expert disclosure deadline, which is currently set for
 26 December 19, 2022.

27 2. **Expert witness depositions:** Expert witness depositions are expected to be
 28 completed after the disclosure of expert witnesses pursuant to this Court's order. Each party

1 expects to retain multiple expert witnesses. It will take additional time to coordinate, prepare for,
 2 and take the depositions.

3 **3. Other discovery:** Moreover, the extension will allow the parties to do any
 4 necessary follow-up discovery, including conferring about existing discovery responses and
 5 serving additional written discovery, deposing later-identified witnesses and experts, and obtaining
 6 any additional medical and employment records.

7 There is no trial date yet set in this case.

8 **III. PROPOSED REVISED DISCOVERY PLAN**

9 **A. Summary of Proposed Changes**

10 The parties hereby stipulate to continue the discovery deadlines and dispositive motion
 11 deadline 90 days, which the parties estimate to be necessary for the discovery listed above.

	Present Date	Proposed New Date
13 Amend pleadings/add parties	November 17, 2022	February 15, 2023
14 Initial expert disclosure for all 15 parties	December 19, 2022	March 20, 2023
16 Rebuttal expert disclosure for all 17 parties	January 16, 2023	April 17, 2023
18 Discovery cutoff	February 15, 2023	May 16, 2023
19 Dispositive motions	March 17, 2023	June 15, 2023
20 Joint proposed pretrial order	April 17, 2023 or 30 days 21 after resolution of 22 dispositive motions.	July 17, 2023 or 30 days after resolution of dispositive motions.

23 **B. Discovery cut-off date:** May 16, 2023.

24 **C. Dispositive Motions:** Dispositive motions may be filed no later than June 15, 2023,
 25 which is thirty (30) days from the discovery cut-off date.

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3 **D. Pretrial Order:** The pretrial order shall be filed by July 17, 2023, which is not later
4 than thirty (30) days after the date set for filing dispositive motions. In the event dispositive
5 motions are timely filed, the date for filing the joint pretrial order shall be suspended until thirty
6 (30) days after the decision of the dispositive motions or until further order of the Court.

7 **SUBMITTED BY THE FOLLOWING COUNSEL OF RECORD:**

8 DATED this 6th day of October, 2022.

9
10 DATED this 6th day of October, 2022.

11 **BERNSTEIN & POISSON**

12 /s/ Amber N. King

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28 *Attorneys for Defendant Carriage*
29 *Cemetery Services, Inc.*

PROPOSED ORDER

IT IS SO ORDERED. Based upon the forgoing stipulation, the following extensions to discovery deadlines are granted.

	Present Date	Proposed New Date
Amend pleadings / add parties	November 17, 2022	February 15, 2023
Initial expert disclosure for all parties	December 19, 2022	March 20, 2023
Rebuttal expert disclosure for all parties	January 16, 2023	April 17, 2023
Discovery cutoff	February 15, 2023	May 16, 2023
Dispositive motions	March 17, 2023	June 15, 2023
Joint proposed pretrial order	April 17, 2023 or 30 days after resolution of dispositive motions.	July 17, 2023 or 30 days after resolution of dispositive motions.

NO FURTHER EXTENSIONS WILL BE GRANTED.

UNITED STATES MAGISTRATE JUDGE

DATED: October 7, 2022

CASE NO.: 2:22-cv-00814-JAD-NJK